

HOFLAND & TOMSHECK
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JORGE RAUL FLORES,

Defendant.

Case No. 2:22-mj-533-DJA

**ORDER TO CLOSE CASE
PURSUANT TO DEFENDANT'S
COMPLIANCE**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Imani Dixon, Esq., Assistant United States Attorney, counsel for the United States of America, and Joshua Tomsheck, Esq., of HOFLAND & TOMSHECK, counsel for Defendant, Jorge Raul Flores, as follows:

IT IS FURTHER STIPULATED AND AGREED, that counsel for the defendant has provided proof of completion to the Government for the DUI School, the Victim Impact Panel and the 8-hour Alcohol Awareness Program as required pursuant to the Petty Offense Plea Agreement;

IT IS FURTHER STIPULATED AND AGREED, that the defendant has paid the \$500.00 fine and the \$10.00 assessment fees imposed;

IT IS FURTHER STIPULATED AND AGREED, that the defendant has not returned

1 to Lake Mead National Recreation Area for the six (6) month period as directed;

2 IT IS FURTHER STIPULATED AND AGREED, that the defendant completed all
3 obligations imposed by the Court and the parties agree to jointly move to allow the
4 defendant to withdraw his plea of guilty to Count One - Operating a Motor Vehicle while
5 Under the Influence of Alcohol;

6 IT IS FURTHER STIPULATED AND AGREED, that the Government will move to
7 amend Count One to a charge of Reckless Driving, a violation of 36 C.F.R. § 4.2 and N.R.S.
8 484B.653. The defendant will plead guilty to the amended Count One of the Complaint.

9 IT IS FURTHER STIPULATED AND AGREED, that the parties jointly agree that the
10 original sentence be applied to the Reckless Driving conviction.

11 DATED this 28th day of August, 2023.

12 Respectfully submitted,

13 HOFLAND & TOMSHECK

JASON M. FRIERSON
United States Attorney

14
15 /s/ Joshua Tomsheck
16 JOSHUA TOMSHECK, ESQ.
Counsel for Defendant

/s/ Imani Dixon
IMANI DIXON, ESQ.
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

Case No. 2:22-mj-533-DJA

5 vs.

6 JORGE RAUL FLORES,

ORDER

7 Defendant.

8
9 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
10 Court finds that:

- 11 1. That counsel for the defendant provided proof of completion for the DUI School,
12 the Victim Impact Panel and the 8-hour Alcohol Awareness Program as required
13 pursuant to the Petty Offense Plea Agreement;
- 14 2. That the defendant paid the \$500.00 fine and the \$10.00 assessment fees imposed;
- 15 3. That the parties agree that the defendant completed all the obligations imposed,
16 the parties agree to jointly move to allow the defendant to withdraw his plea to
17 the Operating a Motor Vehicle while Under the Influence;
- 18 4. That the Government will move to amend Count One of the Complaint to the
19 charge of Reckless Driving. The defendant will plead guilty to the amended Count
20 One of the Complaint;

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22 / / /

23 / / /

ORDER

IT IS FURTHER ORDERED that the original sentence be applied to the amended Count One of Reckless Driving;

IT IS FURTHER ORDERED that the case be closed and the September 1, 2023 date be vacated.

DATED this 30th day of August, 2023.



DANIEL J. ALBREGTS
United States Magistrate Judge